

## REMARKS

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the Office Action mailed July 9, 2008, in light of the following remarks.

Claims 1-26 are presented for examination, of which claims 1 and 12 are in independent form. Claims 1, 12, 17, and 20-23 have been amended to emphasize the novelty of Applicants' invention over the cited art. Support for these amendments may be found at, for example, paragraphs [0023] and [0024] of Applicants' specification, as originally filed. No new matter has been added.

Claims 1-26 are newly rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner contends that the claimed feature of "performing file conversions" is not found in the specification. Although Applicants disagree with this contention, they have removed the rejected language from the claims and submit that the grounds for this rejection are obviated.

Claims 1-26 continue to be rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0049853 (Chu). Applicants believe that the Chu publication fails to teach or suggest features of the present invention previously recited in the claims, and thus traverse this rejection. Nevertheless, Applicants submit that the claims, as amended, amplify the distinction between the present invention and Chu.

As amended, independent claim 1 recites that a system to facilitate movement of electronic files includes, among other components, a file transformation component. By the use of enterprise logic, this component enriches file content and converts a file type to another file type.

The Chu publication fails to teach or suggest a file transformation component configured to convert between file types. The file transfer system of Chu includes the receipt of an electronic file (or package) at a client from one or more servers, a process generally illustrated by Figs. 7, 7-1, and 7-2. As noted in the Office Action at page 2, the client can decompress and restore a received file (paragraph [0058]). Moreover, client-server communications may be encrypted (paragraph [0057]). However, while Chu may disclose decompressing, restoring, and encrypting a file, none of these acts converts the file type of the file to another file type.

The Microsoft Computer Dictionary, 3rd Ed. (“the Dictionary”), upon which the Examiner relies heavily in the Office Action, supports the distinction between Chu and the features of the file transformation component recited in claim 1. At page 196, the Dictionary defines “file type” as a designation of a file. This definition is supplemented by reference to the definition of “file format”. At page 194, the Dictionary defines “file format” as the structure of a file and provides several examples, including RTF, DCA, PICT, and TIFF. (Applicants’ own specification provides further examples at paragraph [0024], namely XML and fixed record formats of legacy systems.) On this same page, the Dictionary further defines “file conversion” as:

The process of transforming the data in a file from one format to another without altering its contents—for example, converting a file from a word processor’s format to its ASCII equivalent.

Thus, examples of converting among file types include transforming an RTF file to a DCA file, transforming a PICT file to a TIFF file, and transforming an XML file to a fixed-record file.

Chu does not disclose converting among file types. As defined by the Dictionary, to “decrypt” or “uncompress” a file is simply to restore it to its original form, i.e., decrypting an encrypted file or uncompressing of a compressed file. The file type of a file is unaffected by encryption/decryption or compression/uncompression. A compressed TIFF file after uncompression remains a TIFF file. An encrypted XML file after decryption remains an XML file. Nowhere does Chu disclose or suggest converting among file types during file transfer. Therefore, Applicants submit that Chu fails to teach or suggest this feature of the present invention, as recited in claim 1.

Claim 12 recites a method to facilitate the movement of electronic files within a system. Among the features of this method is converting a file type of a file to another file type. Therefore, the reasoning set forth above with respect to claim 1 is similarly applicable to claim 12. Applicants submit that Chu fails to teach or suggest this feature of the present invention, as recited in claim 12.

The remaining rejected claims in this application depend from either Claim 1 or Claim 12, and are thus submitted to be patentable for at least the same reasons. Because each dependent claim also defines an additional aspect of the invention, Applicants request individual reconsideration of the patentability of each claim on its own merits.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

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